

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT NEW YORK

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THE ASSOCIATED PRESS, : : 12 Civ. 1087(DLC)(FM)  
Plaintiff, : :  
: : ECF Case  
- against - : :  
MELTWATER U.S. HOLDINGS, INC.; : : **ORAL ARGUMENT REQUESTED**  
MELTWATER NEWS U.S., INC.; and : :  
MELTWATER NEWS U.S. 1, INC. : :  
: :  
Defendants. : :  
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**NOTICE OF MOTION FOR PLAINTIFF'S MOTION  
FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that upon the attached declarations of Thomas Curley, dated November 5, 2012, Sue Cross, dated November 8, 2012, Joy Jones, dated November 6, 2012, Thomas Kent, dated November 6, 2012, Elizabeth A. McNamara, dated November 9, 2012, John D. Rizzo, dated November 7, 2012, and Keri McKenzie, dated November 7, 2012, together with the exhibits attached thereto, the accompanying Memorandum of Law of Plaintiff The Associated Press in Support of Its Motion for Summary Judgment on Its Copyright Infringement Claim, Plaintiff's Local Rule 56.1 Statement of Material Facts As To Which There Is No Genuine Issue To Be Tried, and upon all prior pleadings and proceedings had herein, plaintiff The Associated Press ("AP") will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 15B, New York, New York 10007-1312, on January 11, 2013, or as soon thereafter as counsel may be heard, for an order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting AP's motion for summary judgment against defendants Meltwater U.S. Holdings, Inc., Meltwater News U.S., Inc., and Meltwater

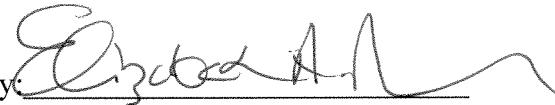
News US1, Inc. on AP's First Cause of Action for direct copyright infringement and AP's Fourth Cause of Action for a Declaratory Judgment in connection with the Registered Articles.

Pursuant to the Court's Order dated October 11, 2012, defendants' papers in opposition to plaintiffs' Motion for Summary Judgment shall be served on or before December 14, 2012, and plaintiff's reply papers shall be served on or before January 11, 2013.

Dated: New York, New York  
November 9, 2012

Respectfully submitted,

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